

**FEDERAL DEFENDER SERVICES
OF WISCONSIN, INC.**

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December 10, 2020

Honorable Stephen L. Crocker,
United States Magistrate Judge
120 North Henry Street
Madison, Wisconsin 53703

Re: *United States v. Daniel Peggs*
Case No. 20-cr-20-jdp

To the Honorable Stephen L. Crocker:

The defense respectfully requests that the Court amend the conditions of Mr. Peggs's bond to allow him to work, to allow him to live at his own pre-approved residence, and to allow him to be on a curfew between the hours of 6 am and 9 pm. I have spoken with USPO Ryan Plender and he has no objection to this request. I have also spoken to AUSA Julie Pfluger and she has no objection to this request.

Peggs has been on supervision for ten months. During that time, he has not had even the slightest violation. That, of course, is in line with the past three decades of his life, where he was a well-respected professional, with no criminal history. As this case continues, the defense would like to ease the restrictions he's under.

After working through this case, it is the defense's view that Peggs is neither a flight risk nor a danger to the community such that he has to be under complete house arrest. And easing these conditions will accord with § 3142(c)(1)(B)'s command of fashioning the least restrictive conditions that will ensure his appearance and the community's safety.

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Thus, the defense respectfully requests that the following conditions be amended:

- Condition 14, allowing him to seek and maintain employment—subject to the probation department's approval.
- Condition 23, allowing him to live at a different residence—one that the probation department approves, in the Madison area. Additionally, that he be placed on a curfew allowing him to leave between the hours of 6 am and 9 pm.

Again, I have spoken to USPO Ryan Plender and AUSA Julie Pfluger about these changes, and they have no objection to this request.

Thank you for your attention to this matter.

Sincerely,

/s/ Joseph A. Bugni

Joseph A. Bugni
Associate Federal Defender